

EXHIBIT 2

Page 1		Page 3	
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		1	C O N T E N T S
-----x)		2	EXAMINATION OF JOHN S. ORLANDO
AMERICAN BROADCASTING COMPANIES,)		3	By Ms. Simons 7
INC., DISNEY ENTERPRISES, INC.,) No. 19-cv-7136		4	
TWENTIETH CENTURY FOX FILM)		5	E X H I B I T S
CORPORATION, CBS BROADCASTING INC.,)		6	(Attached to transcript)
CBS STUDIOS INC., FOX TELEVISION)		7	ORLANDO DEPOSITION EXHIBITS
STATIONS, LLC, FOX BROADCASTING)		8	No. 1 Highly Confidential Settlement
COMPANY, LLC, NBCUNIVERSAL MEDIA,)		9	Communication - Subject to Rule 408
LLC, UNIVERSAL TELEVISION LLC, and)		10	Agreement 11
OPEN 4 BUSINESS PRODUCTIONS, LLC,)		11	No. 2 Application for Digital Television
)		12	Station Construction Permit, Bates
Plaintiffs,)		13	Nos. CBS0003429 to 0003442 93
vs.)		14	No. 3 Article entitled "Next Generation
)		15	TV is on the Horizon," National
DAVID R. GOODFRIEND and SPORTS)		16	Association of Broadcasters 123
FANS COALITION NY, INC.,)		17	No. 4 E-mail string re American Tower
)		18	Completes Construction of Dallas
Defendants.)		19	ATSC 3.0 SFN, Bates Nos.
-----x)		20	CBS0002402 to 0002404 126
REMOTE VIDEOTAPED DEPOSITION OF JOHN S. ORLANDO		21	No. 5 E-mail string re Stations Mum on
TUESDAY, DECEMBER 1, 2020		22	Locast's OTT Bite in Big Apple,
12:40 P.M. EASTERN STANDARD TIME			Bates Nos. CBS0003364 to 0003365 133
Pages: 1 - 272			No. 6 E-mail string re Locast on Roku,
Reported by: Leslie A. Todd, CSR No. 5129 and RPR			Bates Nos. CBS0003352 to 0003353 136
DIGITAL EVIDENCE GROUP			No. 7 E-mail string re Note from JPM
1730 M Street, NW, Suite 812			Morgan on Locast, Bates No.
Washington, D.C. 20036			CBS0003338 138
(202) 232-0646			
Page 2		Page 4	
1	AP P E A R A N C E S	1	E X H I B I T S C O N T I N U E D
2		2	(Attached to transcript)
3	ON BEHALF OF PLAINTIFFS:	3	ORLANDO DEPOSITION EXHIBITS
4	GERSON A. ZWEIFACH, ESQUIRE	4	No. 8 J.P.Morgan Media article, "Can
5	THOMAS G. HENTOFF, ESQUIRE	5	Locast Become a Disruptor to
6	TIAN HUANG, ESQUIRE	6	Broadcast Television," Bates Nos.
7	WILLIAMS & CONNOLLY LLP	7	CBS0003341 to 00003348 139
8	725 Twelfth Street, N.W.	8	No. 9 E-mail string re Free TV App Locast
9	Washington, D.C. 20005	9	Needs Cash to Survive, Bates Nos.
10	(202) 434-5000	10	CBS0002426 to 0002427 143
11	ON BEHALF OF DEFENDANTS:	11	No. 10 E-mail string re Locast, a Free App
12	CAROLINE SIMONS, ESQUIRE	12	Streaming Network TV, Would Love to
13	DAVID HOSP, ESQUIRE	13	Get Sued - The New York Times, Bates
14	SHANE ANDERSON, ESQUIRE	14	No. CBS0003350 146
15	ORRICK, HERRINGTON & SUTCLIFFE LLP	15	No. 11 Edmund Lee tweet re Locast, Bates
16	222 Berkeley Street	16	No. CBS0003351 146
17	Suite 2000	17	No. 12 E-mail string re Tomorrow, Bates
18	Boston, Massachusetts 02116	18	No. CBS0002011 151
19	(617) 880-1885	19	No. 13 E-mail string re CBS Affiliates
20	ALSO PRESENT:	20	Washington draft, Bates Nos.
21	DANIEL HOLMSTOCK, Videographer	21	CBS0002704 to 0002705 157
22		22	No. 14 2017 CBS Affiliates, Washington Cued
			Script v4, Bates Nos. CBS0002706 to
			0002716 158
			No. 15 E-mail string re Fwd: AT&T/DirecTV,
			Bates Nos. CBS0003303 to 0003304 181
			No. 16 E-mail string re Fwd: AT&T Just
			Donated \$500,000 to Locast, Bates
			Nos. CBS0003329 to 0003330 186
			No. 17 E-mail re AT&T Adds Locast App to
			DirecTV, U-Verse Platforms, Bates
			No. CBS0002354 191
			No. 18 E-mail string re AT&T's Revised CBS
			Proposal/subject to internal review/
			Confidential, Bates Nos. CBS0003616
			to 0003618 194

1 (Pages 1 to 4)

<p style="text-align: center;">Page 117</p> <p>1 A I believe that every CBS station does 2 whatever is within the prescribed rules of the FCC 3 and does everything within their, quote, power to 4 reach every household in their market.</p> <p>5 Q Do CBS stations get complaints about 6 poor signals or lack of signal from their viewers?</p> <p>7 A If a -- if a viewer gets a poor picture 8 quality through cable, through satellite, through 9 something else, the first -- the first place they 10 would call would be the local station.</p> <p>11 I do know that there's actually been 12 complaints from -- I recall there was a complaint 13 from CBS station Denver who was attempting to view 14 the CBS signal on Locast, and the first person 15 they called when it was getting a lousy signal was 16 the local station manager.</p> <p>17 So if -- if Comcast goes out when 18 somebody is kicking the winning field goal, 19 they're not going -- they're going to call the 20 local station. That's generally their first place 21 they call --</p> <p>22 THE REPORTER: I'm sorry. What did you</p>	<p style="text-align: center;">Page 119</p> <p>1 there, when -- if complaints came in, and I don't 2 think they were -- I think they were fairly rare, 3 they were usually -- I hesitate to call it viewer 4 error, but they were generally something that 5 could be resolved by working with the viewer as to 6 what to do with their TV set.</p> <p>7 Q I understand.</p> <p>8 My question was, do CBS stations get 9 complaints that are not attributable to something 10 that can be resolved with working with the viewer 11 to fix their TV set?</p> <p>12 A I -- I -- I couldn't give you any 13 specific ones that I'm aware of.</p> <p>14 Q So you're able to give me specifics of 15 every other scenario, but not of the particular 16 scenario that I'm asking about, which is over-the- 17 air signals over the antenna that have nothing to 18 do with user error.</p> <p>19 MR. ZWEIFACH: Objection.</p> <p>20 Argumentative.</p> <p>21 THE WITNESS: My -- my --</p> <p>22 MR. ZWEIFACH: Is that a comment on his</p>
<p style="text-align: center;">Page 118</p> <p>1 say after, "That's generally their first place 2 they call"?</p> <p>3 THE WITNESS: Is their local station.</p> <p>4 THE REPORTER: Thank you.</p> <p>5 THE WITNESS: Mm-hmm.</p> <p>6 BY MS. SIMONS:</p> <p>7 Q Do CBS stations also get complaints 8 about poor over-the-air signals that they're 9 receiving through their antenna?</p> <p>10 A I'm aware of -- you know, periodically I 11 heard of some. Most of those come back to what I 12 was referring to earlier at the various -- excuse 13 me -- at the various FCC repacks, the stations 14 would get some calls because they -- the viewer 15 had to rescan their television set and didn't 16 quite know how to do it.</p> <p>17 Q Do CBS stations get complaints about 18 poor over-the-air signals that they are receiving 19 through their antenna that is not attributable to 20 user error or outdated scanning from their set?</p> <p>21 A You know, when -- let me try to answer 22 it this way. Again, reflecting on when I was</p>	<p style="text-align: center;">Page 120</p> <p>1 testimony or is that a new question?</p> <p>2 MS. SIMONS: It's a question.</p> <p>3 MR. ZWEIFACH: Okay.</p> <p>4 THE WITNESS: So my -- my exposure to 5 what I heard from station managers were primarily 6 during the various repacks when I would be in 7 regular touch with them as to what was going on 8 with the -- with the repack and how -- how they 9 were doing with the viewers in those markets.</p> <p>10 BY MS. SIMONS:</p> <p>11 Q Mr. Orlando, what is ATSC 3.0?</p> <p>12 A Don't ask me -- don't ask me to tell you 13 what ATS -- ATSC stands for.</p> <p>14 3.0 is -- as I understand it, is a 15 experimental new standard as to which -- they have 16 IP-based internet protocol, based -- of which some 17 broadcasters are, under FCC authorization, are 18 experimenting with.</p> <p>19 I guess the best way to describe it 20 perhaps is when, you know, there's a new broadcast 21 standard from analog to digital, this is another 22 one that some of the broadcasting industry is</p>

Page 269 1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER 2 The undersigned Certified Shorthand Reporter 3 does hereby certify: 4 That the foregoing proceeding was taken before 5 me remotely via Zoom videoconferencing at the time 6 therein set forth, at which time the witness was 7 duly sworn; That the testimony of the witness and 8 all objections made at the time of the examination 9 were recorded stenographically by me and were 10 thereafter transcribed, said transcript being a 11 true and correct copy of my shorthand notes 12 thereof; That the dismantling of the original 13 transcript will void the reporter's certificate. 14 In witness thereof, I have subscribed my name 15 this date: December 4, 2020. 16 17 18 _____ 19 LESLIE A. TODD, CSR, RPR 20 Certificate No. 5129 21 22	Page 271 1 Digital Evidence Group, L.L.C. 2 1730 M Street, NW, Suite 812 3 Washington, D.C. 20036 4 (202) 232-0646 5 SIGNATURE PAGE 6 Case: American Broadcasting Companies, Inc., et al. v. Goodfriend, et al. 7 Witness Name: John S. Orlando 8 Deposition Date: December 1, 2020 9 10 (Check appropriate box): 11 () The same is a true, correct and 12 complete transcription of the answers given by 13 me to the questions therein recorded. 14 () Except for the changes noted in the 15 attached Errata Sheet, the same is a true, 16 correct and complete transcription of the 17 answers given by me to the questions therein 18 recorded. 19 20 21 22 _____ 23 _____ 24 _____ 25 _____ 26 _____ 27 _____ 28 _____ 29 _____ 30 _____ 31 _____ 32 _____ 33 _____ 34 _____ 35 _____ 36 _____ 37 _____ 38 _____ 39 _____ 40 _____ 41 _____ 42 _____ 43 _____ 44 _____ 45 _____ 46 _____ 47 _____ 48 _____ 49 _____ 50 _____ 51 _____ 52 _____ 53 _____ 54 _____ 55 _____ 56 _____ 57 _____ 58 _____ 59 _____ 60 _____ 61 _____ 62 _____ 63 _____ 64 _____ 65 _____ 66 _____ 67 _____ 68 _____ 69 _____ 70 _____ 71 _____ 72 _____ 73 _____ 74 _____ 75 _____ 76 _____ 77 _____ 78 _____ 79 _____ 80 _____ 81 _____ 82 _____ 83 _____ 84 _____ 85 _____ 86 _____ 87 _____ 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